

Actions taken to implement EO 14251 as of June 24, 2025 (before Preliminary Injunction)

	Has refused to recognize unions as exclusive reps?	Has terminated CBAs?	Has suspended dues processing?	Has eliminated official time and reassigned employees who used it?	Has refused participation at FLRA?	Has terminated or refused to participate in grievance or arbitration proceedings?	Has reclaimed agency space or equipment used by the unions?
OPM	Yes, for the following organizations in OPM: OCIO, HCDMM, and OESPIM ¹	No. ²	Yes, for the following organizations: OCIO, HCDMM, and OESPIM	Not applicable. Employees who used official time in the affected organizations have separated from OPM.	Not applicable. No matters related to these organizations have been elevated to the FLRA.	Not applicable. There are no pending grievances or arbitrations involving employees from the affected organizations.	No. CBA provisions on agency space and equipment remain in place as applicable to OPM organizations not affected by EO 14, 251
State	Yes	Yes	Yes	Yes	Held in abeyance	Yes	Yes
USAID	No	No	Yes	No	No	No (currently in arbitration)	No. but AFGE has no office space due to termination of the office lease.
DoD	No	No	Yes	Yes, but varies by component	The FLRA has held proceedings in abeyance	Have been in abeyance/requested an abeyance	Some had, but most had not
Treasury (U.S. Mint)	No	No	No	No	No	No	No
VA	No	No, except one agreement terminated not pursuant to the EO	Yes	No	No, but is requesting matters be held in abeyance	No, but is requesting matters be held in abeyance	No

¹ Office of the Chief Information (“OCIO”), Human Capital Data Management and Modernization (“HCDMM”), and Office of the Executive Secretariat and Privacy and Information Management (“OESPIM”). Ex. 2 ¶ 4.

² OPM informed unions representing OCIO, HCDMM, and OESPIM employees on April 3, 2025 that the CBA no longer applied to them, but the CBA has not been cancelled. Ex. 2 ¶ 4.

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DOJ	No	No	Yes	Not eliminated in full, but has denied official time	No, requested abeyance	No	No, although, the national counsel representing the Bureau of Prison bargaining unit is no longer allowed space in the DC office
HHS	Yes	No	Yes	Eliminated approved official time but made no reassignments.	N/A – no current proceedings	Yes	No
USCIS	No	No	Yes ^[3]	No	No	Held in abeyance ^[4]	Yes
USCG	No	No	Yes, but varies	Yes, Firefighters and AFGE Council leadership supporting eligible employees remain eligible to use official time	No	Held in abeyance.	No
ICE	No	No	No (however NFC paused them for 2 pay periods)	No	No	No ^[5]	No

³ On or about May 7, 2025, USCIS received notice that NFC would be reinstituting dues deduction. USCIS is awaiting confirmation that this action has been implemented. Ex. 10 ¶ 4.

⁴ USCIS has participated in a single arbitration that was pending prior to the issuance of EO 14251. Ex. 10 ¶ 4.

⁵ See Ex. 12 ¶ 5 (explaining more comprehensively ICE's approach to grievances and arbitrations).

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DOI	No	No	Yes	No	DOI has not refused to participate in FLRA matters for the Plaintiff unions. FLRA has granted abeyances for matters impacted by the EO 14,251	DOI has participated in the grievance process by denying grievances excluded under the EO and proceeded with grievances allowed under the EO. DOI has also received abeyances of arbitrations.	No
Energy	No, but we have not been engaging with the unions	No	No, but we are not processing any new dues deduction enrollments	No	No pending matters	No, but has held them in abeyance while litigation is pending	No
USDA	No (except for a brief period)	No (except for a brief period)	Yes, except for a brief period	Eliminated official time but made no reassignments.	No, held in abeyance.	No, held in abeyance.	No.
EPA	No	No	Yes	No	No	No	No
NSF	No	No	Yes	Yes as to official time, no as to reassignments	No	Yes	Yes, reclaimed space
USITC	No	No	Yes	No	N/a—no cases pending before the FLRA	Yes	No
GSA	No	No, GSA previously terminated its CBA on April 1 but rescinded such termination on April 25	Yes	Yes	No, they are held in abeyance	All pending national grievances held in abeyance; no arbitrations	Yes

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SSA	No	No	Yes	Eliminated approved official time and made one reassignment.	No	No, held in abeyance.	No
DOL	No	No	Yes, only for the excluded employees	No	No	No	No
HUD	No	No	Yes, for OCIO employee only	No	No	No	No
DOT	No ^[6]	No	Yes	No	No	No	No
ED	No	No	No	No	No	No	No

⁶ On Monday March 31, 2025, the Office of the Secretary of Transportation (“OST”) provided a preliminary notice to AFGE, that it would no longer recognize the Union as the exclusive representative for its OCIO employees and that the CBA provision that identifies the OCIO as part of the bargaining unit was void. However, no further action has been taken to remove OST OCIO employees from the bargaining unit, and no employee’s bargaining unit status was changed in the system. Ex. 23 ¶ 5.